

ANDREW M. BATEMAN General Counsel for ORS

Office of Regulatory Staff 1401 Main Street Suite 900 Columbia, SC 29201 (803) 737-0800 ORS.SC.GOV

March 2, 2021

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE:

Application of Piedmont Natural Gas Company, Inc. for Expedited Approval of

Waiver of Late Payment Penalties

Docket No. 2021-69-G

Dear Ms. Boyd:

By this letter, the South Carolina Office of Regulatory Staff ("ORS") hereby notifies the Public Service Commission of South Carolina ("Commission") that ORS has reviewed the filing submitted to the Commission by Piedmont Natural Gas Company, Inc. ("PNG" or "Company") on February 23, 2021, for expedited approval of a waiver of Late Payment Penalties for certain customers in bill cycles 8 through 12 of February.

Due to the winter storm in Texas, the Company's third-party vendor for printing and mailing billing statements halted pertinent operations for one day and there has been significant delays in postal services to and from Texas. These circumstances have impacted the timely mailing of customer bills in cycles 8 through 12 of the Company's February billing cycles.

Certain of the Company's Commission-approved tariffs prescribe a 1 ½% late payment charge. The collection of late payments charges is allowed, but not prescribed, according to S.C. Code Ann. Regs. 103-439(3). The Company, therefore, requests Commission approval to waive the prescribed 1 ½% late payment charge as stated in the Company's tariffs.

The waiver request is limited to PNG's South Carolina customers who experienced delayed bills as a result of the winter weather event identified earlier. The circumstances impacting these billing cycles only apply to customers who still receive a paper copy of their billing statement. According to the Company's application, approximately 70% of customers in cycles 8 through 12, or about 30,700 customers, will experience a delay in receiving a paper copy of their billing

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statement. The Company also states it will forgo the disconnection of service for 30 days for those customers impacted by this delay.

On March 1st, the Company filed a supplemental letter to inform the Commission of similar language in its Commission-approved Service Regulations.

ORS supports the Company's request for expedited approval of a waiver of Late Payment Penalties for certain customers impacted by the aforementioned weather event. ORS also supports the Company's suspension of disconnects by one month for those impacted customers.

ORS reserves the right to review any request for recovery of costs related to this request in future proceedings.

Sincerely,

s/ Andrew M. Bateman

Andrew M. Bateman

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)